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Date: JAN 18 2017
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John Kieling, Bureau Chief
Hazardous Waste Bureau
New Mexico Environment Department
2905 Rodeo Park Drive East, Building 1
Santa Fe, NM 87505-6303

Subject: Response to Review of the Periodic Monitoring Report for White Rock Canyon General Surveillance Monitoring Group, First Quarter, Monitoring Year 2016

Dear Mr. Kieling:

The New Mexico Environment Department (NMED) provided comments on October 11, 2016, on the Periodic Monitoring Report for White Rock Canyon General Surveillance Monitoring Group, First Quarter, Monitoring Year 2016, submitted in February 2016 by the U.S. Department of Energy (DOE) and Los Alamos National Security, LLC (LANS) (collectively, the Permittees). To facilitate review of the Permittees's responses, NMED's comments are included verbatim, followed by the Permittees's responses.

NMED Comment:

1. *Gross alpha and gross beta activity was detected at several sampling locations where no activity was detected during the four previous monitoring events. Gross alpha detections are reported at Spring 3A (11.3 pCi/L), Spring 5 (7.38 pCi/L), Spring 6 (1.95 pCi/L), and Spring 9 (6.31 pCi/L). Gross beta detections are reported at Spring 5A (12 pCi/L) and Spring 9A (8.6 pCi/L).*

LANL Response:

As discussed in Section 4.2 of the periodic monitoring report (PMR), radionuclide data are provided on a voluntary basis, but analysis of radionuclide data (including the reporting of radionuclide screening level exceedances) are not presented in PMRs. This presentation is in accordance with DOE policy.

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NMED Comment:

2. *Several analytes were detected above screening levels at various locations but were not reported in Section 5.2, Analytical Results or Table 4.2-3, Groundwater Results Above Screening Levels. Tin was detected above the screening level (3.26 mg/L) at Spring 3A (3.84 mg/L), Spring 4AA (11.8 mg/L), and Spring 6 (27.1 mg/L). Total Dissolved Solids were detected above the screening level (191.7 mg/L) at Spring 4 (239 mg/L) and Spring 4B (261 mg/L). Zinc was detected above the screening level (3.89 mg/L) at Ancho Spring (4.46 mg/L). Chloride was detected above the screening level (3.57 mg/L) at Spring 4b (8.83 mg/L). These analytes were reported in the Permittees' Monthly Notification of Groundwater Data Reviewed in December 2015 (LA-UR-15-29389) dated December 15, 2015.*

   Detections such as those referenced above must be discussed in the Permittees' Periodic Monitoring Reports.

LANL Response:

The screening levels cited in the comment are all groundwater background values that are used for the 15-day notification. Exceedances of background values are not reported in PMRs.

If you have any questions, please contact Steve Paris at (505) 606-0915 (smparis@lanl.gov) or Hai Shen at (505) 665-5046 (hai.shen@em.doe.gov).

Sincerely,

Bruce Robinson, Program Director
Environmental Remediation Program
Los Alamos National Laboratory

Sincerely,

David S. Rhodes, Director
Office of Quality and Regulatory Compliance
Environmental Management
Los Alamos Field Office

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